



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 18, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Wood County Telco (Solarus)
Study Area Code 330974**

Dear Ms. Dortch:

On behalf of Wood County Telco (Solarus) (“Wood County”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Wood County seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Wood County Telco (Solarus)
Study Area Code 330974
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Wood County Telco (Solarus) (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

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FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Greg Krings
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	krings@solarus.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 8	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) 330974wi330.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	330974wi510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	330974wi610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net
<110>	Has your company received its ETC certification from the FCC?	<input type="radio"/> (yes / no) <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets
<114>	Report how much universal service (USF) support was received
<115>	How (USF) was used to improve service quality
<116>	How (USF) was used to improve service coverage
<117>	How (USF) was used to improve service capacity
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.

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WOOD COUNTY TELEPHONE COMPANY D/B/A SOLARUS (SAC 330974)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

REDACTED - FOR PUBLIC INSPECTION

**(200) Service Outage Reporting (Voice)
Data Collection Form**

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

[illegible]

(800) Operating Companies
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net
<810>	Reporting Carrier	Wood County Telephone Company dba Solarus
<811>	Holding Company	Wood County Telephone Company dba Solarus
<812>	Operating Company	Wood County Telephone Company dba Solarus

[illegible]

(900) Tribal Lands Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	330974	
<015>	Study Area Name	WOOD COUNTY TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings	
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net	
<910>	Tribal Land(s) on which ETC Serves	<div>Ho Chunk Nation</div> <div>330974w1920.pdf</div>	
<920>	Tribal Government Engagement Obligation	Name of Attached Document	

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select (Yes, No, NA)
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	Yes

FCC Form 481 – Line 920 Description of Tribal Engagement Activities

SAC: 330974
State: WI
Name: Wood County Telephone Company

47 CFR §54.313(a)(9) requires a recipient, to the extent it serves Tribal lands, document or provide information demonstrating that the ETC had discussions with Tribal governments.

The Ho Chunk Nation occupies 92 acres of property within the Study Area. Lifeline service is advertised and available, with no current Tribal subscribers. Broadband is available throughout these Tribal Lands, which include a casino, a wellness office, a convenience store/gas station, and some residential subscribers within a single rate center in the Company's Study Area.

A request for Tribal Engagement discussions was made by the company was followed by additional attempts to identify suitable representatives for these discussions. Ho Chunk tribal representatives were identified and an engagement discussion included these agenda items:

- Exchange of contact information and roles, for the development of a continuing liaison between the Ho Chunk and the company.
- Confirmation that Lifeline services remain available, and the preferred pathway for prospective application materials will be through the Tribe's Director of Social Services; Recent changes to the FCC's federal Lifeline Plus and Link-Up Plus programs were covered, as well as the FCC's limitations of one benefit per home unit.
- It is believed that products are services are being marketed in a culturally sensitive manner, at least in recent years. Any future issues that surface will be immediately communicated, and then brought back to this group.
- Recent service expansions were noted, and no sites or neighborhoods are known to be in need of improved communications facilities or capabilities at this time. Ho Chunk representatives will report any future concerns, if they arise.
- There have been no Right-of-Way, licensing or other regulatory compliance issues in recent years. The Ho Chunk opened up a communications pathway through their Historic Preservation Office for the purpose of identifying any future environmental or land use issues the Tribe has. These will be along the same lines as issues managed between tribal branches and state government. Any developing issues of concerns will be reported directly to the company, if they arise.
- Ho Chunk representatives were appreciative that communications service contracts now include sovereignty language. These are required by the Tribe. There are no contractual issues needing attention at this time.

Subject: See items below
Location: Conference Call, Bridge # 1-866-369-1316, conf ID # 05478

Start: Mon 10/7/2013 11:00 AM
End: Mon 10/7/2013 11:30 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Wendy Hack
Required Attendees: Dave W. Lambert; Al Aymar (al.aymar@elementmobile.com); Jess. Lozano@ho-chunk.com; William.Browne@ho-chunk.com; rabrams@kiesling.com; Greg Krings; Shana Seubert

Some items of mutual interest and benefit:
• Developing a permanent liaison between the Ho Chunk and the company
• Insuring Lifeline advertisements have reached all enrolled members who might be eligible
• Insuring products are services are marketed in a culturally sensitive manner
• Identifying sites and neighborhoods in need of improved communications facilities
• Surfacing any Right-of-Way issues
• Surfacing any compliance issues

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	

☐

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>330974wil1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation
 Data Collection Form
 Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

<2010>	Incremental Connect America Phase I reporting	
<2011>	2nd Year Certification {47 CFR § 54.313(b)(1)}	
	3rd Year Certification {47 CFR § 54.313(b)(2)}	
<2012>	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2013>	2013 Frozen Support Certification	
<2014>	2014 Frozen Support Certification	
<2015>	2015 Frozen Support Certification	
	2016 and future Frozen Support Certification	
<2016>	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
	Certification Support Used to Build Broadband	
<2017>	Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2018>	3rd year Broadband Service Certification	
<2019>	5th year Broadband Service Certification	
	Interim Progress Certification	
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community area institutions to which began providing access to broadband service in the preceding calendar year.	

<2021>

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report

☒ (Yes/No)
☒ (Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information (Yes/No)

(3018) If the response is no on line 3014, Is your company audited?

(3019) If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☒ (Yes/No)
☒ (Yes/No)
☒ (Yes/No)

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(3026) Attach the worksheet listing required information

330974w13026.pdf

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	330974
<015>	Study Area Name	WOOD COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Greg Krings
<035>	Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	330974
<015> Study Area Name	WOOD COUNTY TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Greg Krings
<035> Contact Telephone Number - Number of person identified in data line <030>	7154218129 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	krings@solarus.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc
Name of Reporting Carrier:	WOOD COUNTY TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/11/2014
Printed name of Authorized Officer:	Gregory Krings
Title or position of Authorized Officer:	Assitant Secretary / Treasurer
Telephone number of Authorized Officer:	7154218129 ext.
Study Area Code of Reporting Carrier:	330974 Filing Due Date for this form: 06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	WOOD COUNTY TEL CO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/11/2014
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	330974 Filing Due Date for this form: 06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

2610 Collins Road – Rudolph

8920 100th St S – Wisconsin Rapids

1780 Biron Drive East – Wisconsin Rapids

7299 2nd Ave – Rudolph

4384 County Rd M – Rudolph

3013 County Rd D – Nekoosa

15131 80th St S – Wisconsin Rapids

3002 County Road C, Wisconsin Rapids

These addresses made inquiries into obtaining broadband service through Wood County Telephone Company. Due to facilities not available in these areas we were not able to provide broadband service. In order to be able to provide broadband service, Solarus needs to perform construction and install facilities in these areas. The plan is to offer broadband service to these address by the end of 2014.

Wood County Telephone Company's Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Wood County Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. Wood County Telephone Company complies with applicable service quality standards for telecommunications providers in the Wisconsin State Statutes (§§100.207 and .208) regulating, advertising, sales and collections practices, and as applicable, those of the Public Service Commission of Wisconsin in the Wisconsin Administrative Code (*Ch. PSC 165*), regarding Standards for Telecommunications Service.

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

Wood County Telephone Company complies with consumer protection requirements including those found in federal Customer Proprietary Network Information (*CPNI*; *WC Docket No. 04-36*), those of the Wisconsin Department of Agriculture, Trade and Consumer Protection (*Ch. ATC 123*) covering appropriate subscription and billing practices and (*Ch. ATC 127*) covering appropriate direct marketing practices. Wood County Telephone Company certifies it has complied with these requirements and will continue to comply with these requirements.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Wood County Telephone Company's Demonstration of Ability to Function in Emergency Situations

Wood County Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹ The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company adheres to state requirements that it makes reasonable provision to function in emergencies, and the Company trains its employees on the procedures to be followed in the event of an emergency in order to mitigate interruption or impairment of service (PSC 165.065). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. The Wisconsin Rapids, Port Edwards, Nekoosa, Rudolph, Town of Rome, and Town of Saratoga COs all have permanent standby generators. The remote switching units have

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

batteries to run on temporarily, and there are mobile generators for extended outages in accordance with PSC 165.065. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. They will continue to run as long as the Company has access to fuel.

FCC Form 481 – Line 1210 Lifeline Service Terms & Conditions

SAC: 330974
State: WI
Name: Wood County Telephone Company
Submission: 10/15/2013

Wood County Telephone Company offers Lifeline service to qualifying subscribers.

- Qualifying subscribers receive Lifeline credits totaling **\$10.00** (\$9.25 via the federal Low Income program, plus \$0.75 via the Wisconsin Universal Service Fund) against the regular **\$14.58** monthly rate for single user residential local telephone service. Qualifying Tribal members may receive larger credits that bring their monthly local service rate down to \$1.00 under the FCC's Enhanced Lifeline program, and pay no initial local service installation charge under the FCC's Enhanced Link-up program.
- Lifeline benefits are limited to one per qualifying household, and for service received from a single provider.
- Number of Local Minutes Provided: Unlimited local calling.
- Additional Charges for Toll Calls: Toll calls are billed at carriers' standard rates.

Lifeline eligibility requires that income be no higher than 135% of the federal Poverty Guideline level, and/or participation in at one of the following programs, verified at least once each year:

- Wisconsin Works (W2)
- Medical Assistance (MA)/Badger Care/Medicaid
- Supplemental Security Income (SSI)
- Food Stamps (SNAP)
- Low Income Home Energy Assistance Program (LIHEAP)
- Wisconsin Homestead Tax Credit (Schedule H)
- Temporary Assistance for Needy Families (TANF)
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Bureau of Indian Affairs General Assistance
- Federal Public Housing Assistance (FPHA)/Section 8
- National School Lunch – Free Lunch Program
- Head Start (if income eligibility criteria are met)

Wood County Telephone Company's local tariff Terms and Conditions for Lifeline Service and residential local rate page are attached.

Exchange Tariff - PSCW

Section 2
 Sheet No. 2
 Amendment No. 165

WOOD COUNTY TELEPHONE COMPANY
 GENERAL RULES AND REGULATIONS
 LIFELINE PROGRAM¹

A. Description

Lifeline is a program designed to provide telephone service at a monthly discounted rate to low income customers, as defined in s. PSC 160.02(8), Wis. Adm. Code. Lifeline rates are established according to s. PSC 160.062(1), (2) and (3), Wis. Adm. Code and are available to all qualified low-income customers.

B. Regulations

The Lifeline Program is available only to qualifying low-income residential customers with a single telephone line per household.

Customers may not be disconnected from Lifeline service for non-payment of toll charges.

If toll blocking is available and the customer has voluntarily elected toll blocking, a service deposit may not be collected to initiate Lifeline service.

If toll blocking is not available, the qualifying low-income customer may be charged a service deposit for initiation of Lifeline service.

Participation in the specified programs must be verified by the telephone company through the Wisconsin Department of Workforce Development (DWD), or the Wisconsin Department of Revenue.

Customers shall complete and remit any query authorization forms or forfeit eligibility. Verification of eligibility will be deemed to be the finding of the Social Security Number (SSN) and name of the listed customer in the active records of DWD for at least one of the specified income assistance programs, or to be a recipient of the Wisconsin homestead tax credit in the past year. Eligibility confirmation through receipt of the Wisconsin homestead tax credit will not become effective until the PSCW acknowledges an acceptable data base query process is in place.

Credits will appear on an eligible customer's bill on the bill date next following the date of application for the Lifeline Program. In cases where a customer's eligibility date as found in DWD records or the records of the Wisconsin Department of Revenue precedes the last bill date prior to application, credit will also be given on one month's prior bill.

Issue _____ Applicable to bills rendered on and after _____

PSCW Authorization by order No. _____ file # _____

Exchange Tariff – PSCW

Section 2
 Sheet No. 3
 Amendment No. 190

WOOD COUNTY TELEPHONE COMPANY
 GENERAL RULES AND REGULATIONS
 LIFELINE PROGRAM

B. Regulations (Cont'd)

Except in cases where a customer's qualifying income assistance programs includes LIEAP or the Wisconsin homestead tax credit, eligibility for the Lifeline Program will continue until the bill date next following a failure to find the customer's SSN in the DWD records.

When LIEAP is one of the customer's qualifying income assistance programs, the Lifeline assistance will continue until the bill date in December next following the close of the heating season. At that time, lack of eligibility will be reverified by the Company before removing the Lifeline assistance from the customer's bill.

When the homestead tax credit is one of the customer's qualifying income assistance programs, the eligibility for Lifeline assistance continues until the bill date in the next June following the end of the tax year. At that time, lack of eligibility will be reverified by the Company before removing the Lifeline assistance from the customer's bill.

The Lifeline Program is not available to customers who are dependents for Federal income tax purposes as defined in 26 U.S.C. Section 152 (1986) Unless the customer is more than 60 years of age.

C. Rates

Lifeline Service monthly credit

The Lifeline Service monthly credit is \$10.00.

(I)

Exchange Tariff - PSCW

Section 2
 Sheet No. 4
 Amendment No. 165

WOOD COUNTY TELEPHONE COMPANY
 GENERAL RULES AND REGULATIONS
 LIFELINE PROGRAM¹

C. Rates Cont'd)

- (ii) to discontinue or modify the conditions under which the services described herein are provided; and
- (iii) to modify the rates, tolls and charges for the services described herein, effective as of the date such services are provided;

based on any declaratory ruling by the Public Service Commission or any decision by court of appropriate jurisdiction reviewing the Commission's declaratory ruling or the validity and application of Wis. Adm. Code Ch. PSC 160.

Issue _____ Applicable to bills rendered on and after _____

PSCW Authorization by order No. _____ file # _____

Exchange Tariff – PSCW

Section 1
 Sheet No. 1
 Amendment No. 616

WOOD COUNTY TELEPHONE COMPANY
 TELEPHONE RATE FILE
 WISCONSIN RAPIDS, PORT EDWARDS, NEKOOSA AND RUDOLPH
 EXCHANGE RATES

Base Rate Service:	<u>Monthly Rate</u>	<u>State USF Assessment</u>	
Business Access Line -			
One-Party	\$27.55	\$0.60	(I)
One-Party (24-month Term)	ICB	0.60	
One-Party (36-month Term)	ICB	0.60	
One-Party (60-month Term)	ICB	0.60	
Key System Line (Multi-line)	\$33.14	\$0.60	(I)
Key System Line (Multi-line) ¹ (24-month Term)	ICB	0.60	
Key System Line (Multi-line) ¹ (36-month Term)	ICB	0.60	
Key System Line (Multi-line) ¹ (60-month Term)	ICB	0.60	
PBX Trunk	\$45.94		(I)
PBX Trunk ¹ (24-month Term)	ICB		
PBX Trunk ¹ (36-month Term)	ICB		
PBX Trunk ¹ (60-month Term)	ICB		
Residence Access Line -			
One-Party	\$14.58	\$0.60	(I)
One-Party Key Pushbutton Line (Multi-line)	13.49		(I)
One-Party Key Pushbutton Line (Grouped)	14.49		(I)

Note 1 – Term pricing applies to purchase on a business accounts of 3 or more lines/trunks.

The State USF Assessment applicable per IBN line, as described in Individual Contract Services, Section 25 Sheet 1, is \$0.60.

- * The monthly rate, including Federal and State taxes, are not applicable for the second exchange line when the second exchange line is requested by hearing-impaired Customers to use Two Line Voice Carryover as defined in the Wis. Admin. Code PSC 160.02 (12).

Switching Service:*

Each switched line \$7.00

*Applicable to Central State Telephone Company's Cranmoor customers only.

Rates in this tariff apply for any other services offered to switcher Customers if not specifically covered in an agreement.

REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

WOOD COUNTY TELEPHONE COMPANY D/B/A SOLARUS (SAC 330974)

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY